

Appl. No. 09/785,864
Amdt. dated October 3, 2005
Reply to Office Action of July 5, 2005

PATENT

REMARKS/ARGUMENTS

Claims 1-11 were pending in this application. No claims have been amended, added, or canceled. Hence, claims 1-11 remain pending. Reconsideration of the subject application as amended is respectfully requested.

Claims 1-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the cited portions of U.S. Patent No. 6,505,163 to Zhang, *et al.* (hereinafter "Zhang") and in view of the cited portions of U.S. Patent Publication No. 2002/0183041 to Wallenius, *et al.* (hereinafter "Wallenius").

Claim Rejections Under 35 U.S.C. § 103(a)

The Applicant respectfully traverses the rejection of all claims, because the office action has not established a *prima facie* case of obviousness.

To establish a *prima facie* case of obviousness, three criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

(MPEP § 2143) Here, the office action has not met all three criteria. Specifically, the office action has not shown that the prior art teaches or suggests all the claim limitations and the suggested motivation fails to motivate one to combine the references.

With respect to claim 1, the Office Action does not cite a reference for the alleged motivation. The Applicants respectfully request an express showing of documentary proof for the alleged motivation.

With respect to claims 2-6 and 8, the Office Action does not address the specific limitations of these claims, other than to say they are rejected. The Applicants, therefore, respectfully request a citation as to where these limitations are found in the cited references. Without this, the Applicants are unable to address the rejections and assume the claims to be allowable.

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Claim 7 includes "permitting the switch-based call forward in said step e)." The Office Action states that this limitation is taught at Fig. 3 of Zhang. It is unclear to the applicants how a system diagram can anticipate a method step, since the system diagram does not teach the actual action recited in the claim. Hence, claim 7 is believed to be allowable. Likewise, claims 9 and 10 include method steps not taught by the system diagram of Fig. 3, and are believed to be allowable for at least this reason.

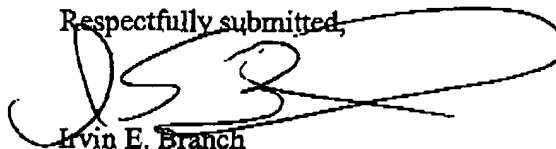
Claim 11 includes "a trigger associated with said first specific digit string and activated by a call to the first specific digit string at the SSP ... said SSP generating a request for a forwarding instruction based upon said trigger." The Office Action states that these limitations are taught at Fig. 4 of Zhang. At that location, however, Zhang appears to teach actions taken based on whether a called party is a subscriber, which has nothing to do with the specific limitations of claim 11. Hence, claim 11 is believed to be allowable.

CONCLUSION

In view of the foregoing, the Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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